

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESAL PRICE)	
LITIGATION)	MDL No. 1456
)	Civil Action No. 01-12257-PBS
)	
THIS DOCUMENT RELATES TO:)	Hon. Patti Saris
)	
<i>United States of America, ex rel. Ven-a-Care</i>)	
<i>of the Florida Keys, Inc., v. Abbott</i>)	
<i>Laboratories, Inc., and Hospira, Inc.</i>)	
CIVIL ACTION NO. 06-11337-PBS)	

UNITED STATES' AND RELATOR'S MOTION FOR A PROTECTIVE ORDER

The United States and Relator hereby move this Court, pursuant to the Court's Order dated August 25, 2006 (Docket No. 3031), and the Court's authority under Rule 26(c)(7) of the Federal Rules of Evidence, to enter their proposed Protective Order, and require that it be made applicable to the case captioned above, as well as any other case that is transferred to *In re: Pharmaceutical Industry Average Wholesale Price Litigation*, MDL No. 1456, Civil Action No. 01-12257-PBS, for coordinated or consolidated pretrial proceedings, in which the United States is a party. The reasons therefor are stated in the accompanying Memorandum of Law.

Respectfully submitted,

For the United States of America,

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Dated: September 15, 2006

CERTIFICATION

The undersigned counsel certifies pursuant to LR 7.1(a)(2) that she and the Relator's counsel, James J. Breen, have conferred with counsel for the Defendant Abbott Laboratories, Inc. on the issues raised in this motion and have not been able to reach agreement.

Dated: September 15, 2006

/s/ Renée Brooker
Renée Brooker

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an electronic copy of the above **UNITED STATES' AND RELATOR'S MOTION FOR A PROTECTIVE ORDER** to be served on all counsel of record via electronic service pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to LexisNexis File & Serve for posting and notification to all parties.

Dated: September 15, 2006

/s/ Renée Brooker
Renée Brooker